

Dockets Management Branch (HFA-315)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

re: Labeling of irradiated foods

Gentlepeople,

I understand that you are seeking comment from the public on proposed changes to the current labeling requirements for irradiated foods, and I want to add my opinion on this issue. I am not violently opposed to irradiation and realise that the process can kill bacteria in foods that cannot be eliminated as surely except by cooking. Also that irradiation can retard spoilage in certain foods. However, I am not personally convinced that this is adequate reason to purchase such food stocks. Price and convenience for food processors, handlers and purveyors are not the only things to consider. At issue is the right of the public to know whether what they are eating has been irradiated. If clearly labeled, we can individually know and decide for ourselves.

There are some very good reasons to hesitate before purchasing irradiated foods, among them are these:

1. Irradiating of food stocks may be hastening the development of resistant bacteria in the processing plants themselves.
2. We may be encouraging unsanitary food processing because the irradiation will be relied on to kill the obvious contaminants (for example partly spoiled food could be sold because no active bacteria were present).
3. Although the scientific community is largely in agreement that there is no harmful residue from the irradiation process, in the recent past opinions have changed as new data appeared. Examples have been the perception of safety in the use of pesticides, herbicides and fumigants. A prudent person has a need to maintain a healthy scepticism, especially as there is no compelling need for this new technology.
4. The expensive equipment and controls will be out of reach for the smaller processors, leading to further consolidation and control of the distribution of foods, with no advantage to the consumer.

Please add these comments in  
favor of labeling all irradiated foods  
to the decision making process.

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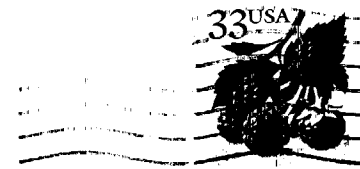
Sincerely, David Weitzer  
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